

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN FULTON,	)	
	)	
	Plaintiff,	) 20-cv-3118
	)	
v.	)	Honorable Judge Lefkow
	)	
ROBERT BARTIK, et al.,	)	
	)	
Defendants.	)	
_____	)	
ANTHONY MITCHELL,	)	
	)	20-cv-3119
Plaintiff,	)	
	)	Honorable Judge Lefkow
v.	)	
	)	
ROBERT BARTIK, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants McRay Judge, Andrew Varga, Eugene Shepherd, and Cook County (hereinafter collectively referred to as the “County Defendants”) by and through their attorneys, Johnson & Bell, Ltd., pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, hereby move this Honorable Court to grant summary judgment in their favor and against Plaintiffs, JOHN FULTON AND ANTHONY MITCHELL, on all claims alleged in their complaints, and to grant such other relief this Court finds reasonable and just. The grounds for this motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

Dated: June 9, 2023

/s/ Brian P. Gainer

One of the attorneys for the

Cook County Defendants

Brian P. Gainer (gainerb@jbltd.com)  
Aleeza Mian (miana@jbltd.com)  
JOHNSON & BELL, LTD.  
33 W. Monroe, Suite 2700  
Chicago, Illinois 60603  
Tel: (312) 372-0770  
Fax: (312) 372-9818

**CERTIFICATE OF SERVICE**

I, Brian P. Gainer, hereby certify that on **June 9, 2023**, I caused to be served the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

*/s/ Brian P. Gainer*